

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JEREMY BAILEY,

NO. 1: 20 - CV - 1836

PLAINTIFF,

V.

DISTRICT JUDGE: KANE

LIEUTENANT YODER,

SERGEANT R. BATIUK,

C/O DERR,

C/O ANTHONY,

DEFENDANTS,

FILED
SCRANTON

NOV 08 2021

PER

DEPUTY CLERK

PLAINTIFF ANSWER'S TO DEFENDANT INTERROGATORIES

Pursuant to Rule 33, Plaintiff Jeremy Bailey provide these answer and objection to Defendant Yoder interrogatories.

1. I do no have any address or telephone number of any of the witnesses who gave a statement of what they witnesses during the event that took place or sept, 10 2019.
2. The DC - 121 part 3 Attachment c 6.3.1, section 17, with the statement from seven different correctional officers c/o Hubble, c/o Haines, c/o Weisbeck, c/o Fritz, c/o Rosso, c/o Houser, Lt Passaretti, and their testimony, plus the video footage from the hand held camera c/o Hubble activated, the unit camera footage, the interrogatories that the plaintiff receive from the Defendant and the production of documents.
3. There is no other suits i have ever filed or been part in.
4. The plaintiff request you to pay him \$ 100,000 in compensatory damages for depriving the plaintiff of his constitutional rights, \$ 25,000 in punitive damages.

5. This question is to have the same answer as question two, the plaintiff will provide all evidence that is entitle to him
6. Since the incident, when the plaintiff was deprive of his constitutional rights and savagely attack by inmate MCcullough # GA-6396, the plaintiff has been place on the mental health roster and been receiving medication for paranoia, help with sleeping, and to prevent reoccurrence the plaintiff has been given a Z - CODE status and look for it to remain a Z - CODE into discharge.
7. Plaintiff has file a grievance, but was not given the information on the identity of the officers such as there names and was not given access to the library while in the R.H.U. and i do not have the grievance number on hand.
8. The DC - 121 part3 Attachment c 6.3.1, section 17, with the statement of seven different officers, the unit video footage which show the Defendant Yoder telling Plaintiff Bailey and inmate MCcullough to get away from the door when both inmate' notify Defendant Yoder of the threats and z - code., and all other evidence the plaintiff is entitle that he has yet to receive from the defendant Yoder.

DATE:  11.3.2021

JEREMY BAILEY,

(SCL) COAL TOWNSHIP

1 KELLEY DRIVE

COALTOWNSHIP, PA 17866.

INTERROGATORIES

1. Please identify the name and, if known, the address and telephone number of each individual currently believed to have discoverable information - along with the subject of that information - that Plaintiff may use as a witness to support his claims. (For your consideration, this may include former or current cellmates of the Plaintiff who have provided a statement.)

ANSWER:

2. Identify all documents that relate or refer to the facts of this case that Plaintiff may use as evidence at trial.

ANSWER:

3. Identify all other civil lawsuits to which you have ever been a party, and identify the other parties to those suits, the reason(s) for the lawsuits, the jurisdiction within which the lawsuits were filed and, if settled or otherwise resolved, the terms of the settlement or judgment.

ANSWER:

4. Plaintiff requests monetary damages in Paragraph 61 of the complaint, specifically “compensatory damages,” and “attorney’s fees.” Provide a computation of each category of monetary damages. Please specify:

- (a.) the factual basis for each element of damages claimed;
- (b.) the amount sought or statutory basis for each element of damages claimed;
- (c.) the formula or measure used for each element of damages claimed; and
- (d.) the specific calculation for each element and the source for each item of data included in the calculation.

ANSWER:

5. Plaintiff seeks punitive damages in Paragraph 61 of the complaint.

Please detail the facts that Plaintiff plans to present to evidence entitlement to punitive damages.

ANSWER:

6. Plaintiff requests injunctive relief in Paragraph 61 of the complaint.

Describe with specificity each and every injunction sought, and the reasons for seeking the injunction.

ANSWER:

7. In Paragraph 48 of the complaint, Plaintiff claims that he has exercised all avenues of exhaustion in accordance with the process that was made available to him. Please detail what efforts Plaintiff made in this regard, listing all document numbers and filing numbers.

ANSWER:

8. Paragraph 57 of the complaint states that Defendant(s) “arbitrarily failed to protect Plaintiff and deprived Plaintiff of life and liberty without due process.” Please identify all facts and documents that you are currently aware of to support this contention.

ANSWER:

Jeremy Bailey 24437
(SCI) Coal Township
1 Bailey Drive
Coal Township PA 18066

INMATE MAIL
PA DEPT OF
CORRECTIONS



RECEIVED
SCRANTON

NOV 08 2021

PER Am
DEPUTY CLERK

Office of the Clerk
UNITED States District Court
235 North Washington Avenue
P.O. Box 11482
Scranton, PA 18501-1148

